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July 28, 1993

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

REPLY COMMENTS
PR Docket No. 93-61
RM 8013

The Port Authority of New York and New Jersey supports the comments filed by the International Bridge, Tunnel and Turnpike Association (IBTTA), representing over 300 toll facilities worldwide, opposing the Notice of Proposed Rulemaking (NPRM) Docket 93-61. Please note that the Port Authority is an existing operator of electronic toll collection systems at the Lincoln Tunnel and Kennedy Airport and has submitted comments to the FCC from this perspective. In addition, the Port Authority is a member of the E-ZPass Interagency Group which is planning regional implementation of electronic toll collection in New York, New Jersey, and Pennsylvania. The E-ZPass Interagency Group has also

THE PORT AUTHORITY OF NY & NJ

Mr. Searcy

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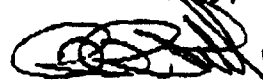
July 28, 1993

For toll authorities planning to install and operate ETM systems in the near future, they would experience implementation delays, greater risks and increased costs with such limited frequency availability.

Enclosed, for your convenience, is a copy of IBTTA's Executive Summary highlighting its opposition to the NPRM.

Thank you for your consideration.

Sincerely,



Richard R. Kelly
Director
Interstate Transportation
Department

Enc.

cc: Ralph Haller, Private Radio Bureau

Executive Summary

**Statement of the
International Bridge, Tunnel and Turnpike Association**

**Amendment of Section 90.239 - Federal Communications
Commission's Rules to Adopt Permanent Regulations for
Automatic Monitoring Systems: RM-8013; PR Docket No. 93-61;
FCC No. 93-141.**

Background

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ETTM Definition

Recent technological advances allow the toll industry to collect tolls electronically in the accurate, efficient and cost-effective manner desired by the motoring public. Using ETTM systems, motorists can pay tolls in a hands-free, non-stop environment at highway speeds.

ETTM systems allow drivers to pass through toll plazas equipped with tag readers. The reader communicates with a tag attached to or in the vehicle and records the transaction. Customers can either pre-pay with cash or by credit card to set up an account and receive a tag. ETTM provides added toll plaza capacity, reduced fuel consumption, less congestion, cleaner air

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In another effort, seven toll authorities in the Northeast are participating in an Interagency Group to select a compatible ETIM system for use by motorists throughout the New York, New Jersey and Pennsylvania region. This region accounts for nearly 40 percent of all toll transactions and 67 percent of all toll revenue in the United States.

The E-ZPass system will allow region-wide electronic toll collection at all toll facilities. These include river crossings, toll facilities serving central business districts, and intra- and inter-state roads operated by the seven member agencies. While each agency in the group is responsible for installing and operating ETIM systems on its own facility, the interagency approach will provide maximum

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Granting this NPRM would jeopardize toll agencies that currently use ETTM applications successfully throughout the United States. It would also seriously hamper those agencies planning to use ETTM in the future. Highway officials could lose the ability to use proven technology to meet regional transportation needs.

Specifically, this NPRM would provide more spectrum for wide-band uses, specifically 16 MHz in the 904-912 and 918-926 MHz bands. Narrow-band applications, such as ETTM, would only be given 10 MHz in the 902-904, 912-918, and 926-928 MHz bands. Secondly, even though the NPRM would not by definition be granting an exclusive use status for one IVHS application, it would be giving wide-band systems exclusivity in bands already used by ETTM systems.

The Association submitted comments, filed December 7, 1992,

CERTIFICATE OF SERVICE

I, Sandra Sachs, a secretary with the law firm of Cohn and Marks, do hereby certify that a copy of the foregoing "Reply Comments of the Port Authority of New York and New Jersey" was hand-delivered (*) or mailed first class, postage prepaid, this 29th day of July, 1993, to the following:

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* By Hand